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USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: 12/4/15
DATE FILED: 12/4/15

By ECF

Honorable Shira Scheindlin
United States District Judge
United States District Court
500 Pearl Street, Room 1620
New York, New York 10007

TPI's request is hereby
GRANTED. TPI's time
to answer the First Amended
Complaint is extended to December 14, 2015.
December 4, 2015

SO ORDERED:

12/4/15


Shira A. Scheindlin
U. S. D. J.

Dear Judge Scheindlin:

The undersigned represents Trammo Caribbean Inc. ("TCI") and Trammo Petroleum Inc. ("TPI") in Commonwealth of Puerto Rico, et al v. Shell Oil Co., et al, 07 Civ. 10470 ("PR I") and Commonwealth of Puerto Rico, et al v. Shell Oil Co., et al, 14 Civ. 01014 ("PR II"), which are pending before Your Honor. As the Court is aware, and as mentioned in the Court's December 3, 2015 Opinion and Order dismissing all claims in PR I as to TPI, TCI's motion to dismiss in PR II, converted by the Court to a summary judgment motion, is subject to negotiations among the parties concerning the language of a stipulation of dismissal, barring agreement on which, the parties have been directed to appear before the Court at a conference on December 14.

While TPI did not move to dismiss in PR II, it is apparent that the Court's ruling that TPI is not subject to personal jurisdiction in PR I would yield the same conclusion in PR II. Since TPI's answer in PR II is due on Monday December 7 pursuant to Your Honor's order of November 17, 2015 extending such time from November 18, we respectfully request that TPI's time to answer or move with respect to the first amended complaint in PR II be extended to December 14, 2015 so that the parties can negotiate an overall stipulation dismissing all claims against TPI in PR II in addition to the Court's dismissal of TPI in PR I and all claims against TCI in both cases. Accordingly, we respectfully request a one week extension, from December 7 to December 14, 2015 for TPI to file its answer or a motion to dismiss in PR II.

Mound Cotton Wollan & Greengrass, LLP

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December 4, 2015
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We have attempted to consult with plaintiff's counsel this morning both by telephone (resulting in a detailed voicemail message) and by email, but have not yet heard back from plaintiff's counsel. Given the approaching Monday deadline, we are sending this letter to Your Honor at this time.

Respectfully submitted,



Barry R. Temkin

cc: All counsel (by ECF)